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*American Cable Ry. Co. v. Chicago City Ry. Co.*, 41 Fed. Rep. 522, was followed, that to come under the jurisdiction of the court, the bill must be filed in season to enable complainant, under the practice and rules of court, to move for and obtain an injunction before the expiration of the patent.

*Sleeping Car Company—Liability for Money Stolen.—Pullman Palace Car Co. v. Gavin*, 23 S. W. Rep. 70 (Tenn.). This was a suit to recover money stolen from the defendant while asleep in a berth in a sleeping car. The circumstances of the theft cast suspicion upon the porter. The court, citing and approving the decision in the similar case of *Carpenter v. Railroad Co.*, 26 N. E. Rep. 277, held that it is the "duty of a sleeping car company to maintain a careful and continuous watch over the interior of the car while the berths are occupied by sleepers," and consequently the company is liable for the loss occurring as a result of failure to perform this duty.

*Wills—Construction—Residuary Bequest.—Crerar et al. v. Williams et al.*, 34 N. E. Rep. 467 (Ill.). The appellants in this case filed a bill in chancery, praying that certain clauses in the will of John Crerar be declared void on the ground that the language used by the testator was insufficient, in law, to make valid testamentary gifts, and that the bequests therein named be decreed to them as heirs. The residue of the estate, after the settlement of all the preceding provisions, was to be converted into money, and used for the purpose of building and maintaining a public library in the city of Chicago. It was held that, since it is a well established rule that all lapsed or void gifts of personal property fall into a general residuary bequest, and this was a valid one, the heirs have no standing to contest the validity of specific bequests, since the annulling of such legacies could not benefit them, but would merely increase the residuary bequest.